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THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

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RUSSELL GREER,

Plaintiff,

v.

JOSHUA MOON, *et al.*

Defendants.

**Addendum to Motion for Sanctions**

Case No. 2:24-cv-00421-DBB

District Judge David Barlow  
Magistrate Judge Jared C. Bennett

NOW COME the Defendants, by and through undersigned counsel, and file Addendum to their Motion for Sanctions which is filed contemporaneously herewith. At the time Defendants served their Motion for Sanctions on January 29, 2025, pursuant to Fed. R. Civ. P. 11, Mr. Greer had not yet disclosed the death of Steve Taylor. Therefore, certain of the statements in the Defendants' Motion for Sanctions do not fully express the current state of affairs.

Mr. Taylor's death, which apparently took place in January 2024, ECF No. 225 at 22, occurred approximately four months *before* the Plaintiff declared Mr. Taylor was both "real" and "eager" to testify, ECF No. 123 at 15, and was only disclosed to Defendants on over a year later, following months of unsuccessful efforts to obtain proper initial disclosures from Mr. Greer, on February 23, 2025. ECF No. 225. This led Defendants to withdraw an earlier request for an inference relating to Mr. Taylor and his anticipated testimony. ECF No. 226 (stating that the news relating to Mr. Taylor's demise contradicts numerous prior statements made by Plaintiff and that sanctions were the appropriate

remedy rather than an adverse inference).

DATED February 20, 2025

**HARDIN LAW OFFICE**

/s/ Matthew D. Hardin

**Matthew D. Hardin**

Attorney for Defendants